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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

InfoSpan, Inc.,

Case No. 8:11-CV-01062 JVS (ANx)

Plaintiff.

**DECLARATION OF NANDAN
PADMANABHAN IN SUPPORT OF
EX PARTE APPLICATION TO
MODIFY THE SCHEDULE**

Emirates NBD Bank PJSC.

Defendant.

DECLARATION OF NANDAN PADMANABHAN

I, Nandan Padmanabhan, an attorney admitted to practice in the State of California, declare as follows:

1. I am an Associate at the law firm of Boies, Schiller & Flexner LLP, and counsel to Plaintiff InfoSpan, Inc. I make this declaration in support of Plaintiff's *ex parte* application to modify the expert discovery schedule, filed concurrently herewith. I have personal knowledge of the facts set out below, and could and would testify competently to those facts if called upon to do so.

2. Attached hereto as Exhibit A is a true and correct copy of a letter sent by me, Nandan Padmanabhan, to Defendant's Counsel, Reza Mirzaie, dated November 15, 2013.

3. Attached hereto as Exhibit B is a true and correct copy of a letter sent by me, Nandan Padmanabhan to Mr. Mirzaie dated November 21, 2013.

4. Attached hereto as Exhibit C is a true and correct copy of an email sent by Mr. Mirzaie to me, Nandan Padmanabhan, on November 13, 2013 at 5:51 p.m.

5. Attached hereto as Exhibit D is a true and correct copy of an email sent by Defendant's Counsel, Baraa Kahf, to me, Nandan Padmanabhan, and to Mr. Mirzaie on November 19, 2013 at 1:05 p.m.

6. Attached hereto as Exhibit E is a true and correct copy of my colleague Jennifer Milici's letter to Mr. Mirzaie dated November 18, 2013.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct.

Executed this 22nd day of November, 2013 in Santa Monica, California.



Nandan Padmanabhan